

August 11, 2005

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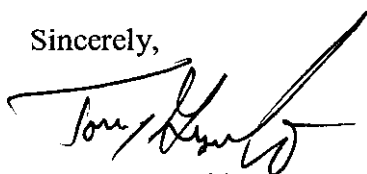
The following comments are in reference to USDA, Agricultural Marketing Service Docket Number TM-04-07 concerning 7 CFR Part 205, National Organic Program Sunset Review process.

Lubrizol Foam Control Additives thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We want to support the list as published, and would like to especially support and continue to allow the following substances as noted in the table below:

Name of Substances	National List Section 7 CFR
Waxes—nonsynthetic (Carnauba wax; and Wood resin)	§ 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food groups(s)).”
Silicon dioxide.	§ 205.605 (b) synthetics allowed
Potassium hydroxide	§ 205.601 (j)(1)
Sodium hydroxide—prohibited for use in lye peeling of fruits and vegetables.	§ 205.605 (b)
Lecithin—bleached.	§ 205.605(b)
Lecithin—unbleached.	§ 205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).”
Petroleum based Synthetic oils.	§ 205.601(e)(6) ; §205.601(i)(6); §205.601(a)(6); §205.2 and §205.601(i)(6)
Nonsynthetics allowed: Acids (Alginic; Citric—produced by microbial fermentation of carbohydrate Substances; and Lactic).	§ 205.605
Glycerine —Allowed as a livestock teat dip, must be produced through the hydrolysis of fats or oils	§ 205.603 (a)(8)
Glycerides (mono and di)—for use only in drum drying of food.	§ 205.605 (b)

Glycerin—produced by hydrolysis of fats and oils	§ 205.605 (b)
Bentonite	§ 205.605 (a) Nonsynthetics allowed:
Calcium carbonate.	§ 205.605 (a) Nonsynthetics allowed:
Kaolin	§ 205.605 (a) Nonsynthetics allowed:
Calcium hydroxide.	§ 205.605 (b) Synthetics allowed:
Chlorine materials— <i>Except</i> , That, residual chlorine levels in the water shall not exceed the maximum residual	§ 205.601 (a)(2) Synthetic substances allowed for use in organic crop production.
Hydrogen peroxide.	§ 205.601 (a)(4) Synthetic substances allowed for use in organic crop production § 205.601 (i)(4); §205.603(a)(9) and §205.605(b)
Magnesium stearate—for use only in agricultural products labeled “made with organic (specified ingredients or food group(s)),” prohibited in agricultural products labeled “organic”.	§205.605 (b) Synthetics allowed:

Sincerely,



Tony Grzowski
Director of Regulatory Affairs

TG:al

cc: Omar Fuentes
Richard Gerke
Bob Hinderer
Frank Magazine
Bonnie Wiseman

Doc: Ltr8419

Substances safety summary information review sheet
Found at the FDA/CFSAN's PAFA EAFUS database:

Docket Number	Main Term	CAS or other code number	Listing in 21 CFR
1854	CARNAUBA WAX (COPERNICIA CERIFERA (ARRUDA) MART.)	008015-86-9	§175.320; §184.1978
1393	SILICON DIOXIDE	007631-86-9	§160.105; §160.185; §172.230; §172.480; §173.340; §175.105; §175.300; §175.320; §176.170; §176.180; §176.200; §176.210; §177.1200; §177.2250; §177.2420; §177.2600; §178.3297; §182.90; §73.1; §73.575
2749	SODIUM HYDROXIDE	001310-73-2	§155.191; §155.194; §163.110; §163.111; §163.112; §172.560; §172.814; §172.892; §173.310; §176.170; §176.180; §176.210; §177.1600; §177.2800; §184.1763; §73.85
2586	POTASSIUM HYDROXIDE	001310-58-3	§163.110; §163.111; §163.112; §172.841; §175.210; §176.180 §176.210; §177.1600; §177.2800; §184.1631; §73.85;
2285	LECITHIN (VEGETABLE)	977092-24-2	§184.1400
0698	HYDROXYLATED LECITHIN	008029-76-3	§136.110; §172.814; §173.340; §176.170; §176.200;
1081	MINERAL OIL, WHITE (Petroleum Based synthetic oils)	008012-95-1	§172.842; §172.878; §173.340; §175.105 §175.210; §175.230; §175.300; §176.170; §177.1200; §177.2260; §177.2600; §177.2800; §178.2010; §178.3570; §178.3620; §178.3740; §178.3910; §573.680
1726	ASPERGILLUS NIGER FOR FERMENTATION PRODUCTION OF CITRIC ACID	009001-23-4	§173.280
1937	CITRIC ACID	000077-92-9	§131.111; §131.112; §133.123; §133.124; §133.129; §133.169; §133.173; §133.178; §133.179; §145.134; §145.145; §146.187; §150.141; §150.161; §155.130; §161.190; §163.11; §163.110; §163.112; §169.115; §169.140; §169.150; §172.755; §172.861; §173.160; §173.165; §173.280; §178.1010; §184.1033; §73.85
2168	GLYCERIN	000056-81-5	§169.175; §172.811; §175.300; §175.320; §176.210; §177.1390; §177.28420; §177.2800; §178.3500; §182.1320; §182.90
2169	GLYCERIN, SYNTHETIC	977091-53-4	§172.866; §178.3500
2415	MONO- AND DIGLYCERIDES	067254-73-3	§136.110; §172.812; §175.105; §184.1505
1754	BENTONITE	001302-78-9	§175.105; §175.300; §176.170; §178.3297 §184.1155
1790	CALCIUM CARBONATE	000471-34-1	§137.105; §137.350; §169.115; §175.300; §176.170; §177.1600; §177.1680; §177.2260; §178.3297; §181.29; §182.5191; §184.1191 §73.1070;
1801	CALCIUM HYDROXIDE	001305-62-0	§135.110; §176.180 §176.210; §184.1205 §73.85
1914	CHLORINE	007782-50-5	§137.105; §137.200
1915	CHLORINE DIOXIDE	010049-04-4	§137.105; §137.200; §173.300; §178.1010
2217	HYDROGEN PEROXIDE	007722-84-1	§133.113; §133.118; §133.136; §133.144; §133.195; §160.105; §160.145; §160.185; §172.723 §172.814; §172.892 ; §173.315; §173.370; §175.105; §178.1005 ; §178.1010and §184.1366